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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT
OF CALIFORNIA**

-----X CIVIL ACTION NO.
BRAVADO INTERNATIONAL GROUP
MERCHANDISING SERVICES, INC.

CV09 09066 PSG (CWx)

Plaintiff,

-against-

**COMPLAINT FOR
TRADEMARK,
RIGHT OF PUBLICITY
AND COPYRIGHT
INFRINGEMENT AND
UNFAIR COMPETITION**

JIN O. CHA a/k/a JIN CHA, OK SPORTSWEAR,
EZ SPORTSWEAR, CHANG OH KIM a/k/a
CHANG O. KIM a/k/a CHUCK KIM, EDEN
SPORTS, INC., JUSTIN JU, SY SPORTS,
SUSAN LEE a/k/a SUSAN YOON, LEE'S
FAMILY, INC., GREEN T CORP., KYUNG
SOOK MA, CESAR IGIESIAS, BLING BLING, INC.,
KAUH UN LEE, ARTHUR BERMAN, WACKY
PLANET a/k/a WACKYPLANET.COM, a/k/a
THEPLANETSHOPS.COM, DAVID AHOUBIAN,
a/k/a DAVID AHOUBIN a/k/a DAVID AHOUBIM,
D&T DISTRIBUTION, PARIS FASHIONS,
CLOTHING ISLAND a/k/a CLOTHINGISLAND.COM,
PRINT LIBERATION, JAIME DILLON, NICK

1 PAPARONE, DR. JAY'S, INC. a/k/a DR. JAYS
 2 a/k/a DR. JAYS.COM, MAGGI FASHION
 3 WHOLESALE, INC., MANSOUR ROKHSARZADEH,
 4 AZIZI AFSHIN a/k/a AFSHIN AZIZI, BARGIN
 5 WHOLESALE CORP. a/k/a BARGIN
 6 WHOLESALE.COM a/k/a WHOLESALE CLOTHING
 7 MARKET.COM a/k/a TBWHOLESALE.COM a/k/a
 8 TOP BRANDS WHOLESALE a/k/a TOP BRANDS,
 9 AHMAD JAMHOUR, OZ COMMUNICATIONS, INC.
 10 a/k/a CRAZYTEES.NET, OTTO SUAREZ, OLGA LYONS,
 11 SHOP RUMOR, LLC, ANOOSHA ZAKARIAN,
 12 ESTHER LEE, KEUM SPORTSWEAR CORP.,
 13 CHAN SONG LEE, AFRICAN AMERICAN DOLLAR
 14 STORE, EDNA CLEMENT SWAN, JACK LEIBERMAN
 15 a/k/a JACK LIEBERMAN, PROGRESSIVERAGS.COM,
 16 SKREENED, LLC, DANIEL CHRISTOPHER FOX, SHIEKH,
 17 LLC d/b/a SHIEKH SHOES, INCREDIBLEGIFTS.COM,
 18 DANIEL LASSOFF, SHAKY CITY BLUES, MARIO
 19 ONTIVEROS, MAIN COLLECTION, INC. a/k/a MAIN
 20 SPORTSWEAR, SU YOUNG CHO, MB SPORTSWEAR,
 21 CHOUNG H. CHOE, RIGHT THANG, HYU JANG YOON,
 22 BUY MERCHANT, INC. a/k/a BUYMERCHANT.COM,
 23 CRAIG N. BENTHAM, STEAL DEAL, INC. ABRAHAM
 24 DAVOOD, MICHAEL DAVOOD, EBBY DAVOOD,
 THE WILD SIDE, INC. a/k/a THEWILDSIDE.COM,
 KINGSLEY SYME a/k/a KINGLEY SYMES,
 SETUP SITE, INC. a/k/a HARRINGTON OUTLETS
 a/k/a OBAMATSHIRTS.US, SOUR CANDY, SHOE
 BALANCE INTERNATIONAL YAK SHOE INC.
 a/k/a WHOLESALE SITUATION, JASON AREF, JULIO
 AREF, WATCH TIME, INC., AZIZ R. ALI, UNISHOW
 (USA), INC. a/k/a UNISHOW, INC., GARY CHEN, RENA
 CHEN, AMILINE.COM, JIAN ZHU, GRAVITY TRADING,
 INC., TONY IN CHONG,

Defendants.

-----X

JURISDICTION AND VENUE

1
2 1. Plaintiff Bravado International Group Merchandising Services, Inc.
3 (hereinafter referred to as "Bravado") is a corporation duly organized under the
4 laws of the State of California with a place of business in Los Angeles, California.
5

6
7 2. Upon information and belief, at all relevant times herein, defendants
8 OK SPORTSWEAR, EZ SPORTSWEAR, EDEN SPORTS, INC., SY SPORTS,
9 LEE'S FAMILY, INC., GREEN T CORP., BLING BLING, INC., WACKY
10 PLANET a/k/a WACKYPLANET.COM, a/k/a THEPLANETSHOPS.COM, D&T
11 DISTRIBUTION, PARIS FASHIONS, CLOTHING ISLAND a/k/a
12 CLOTHINGISLAND.COM, PRINT LIBERATION, DR. JAY'S, INC. a/k/a DR.
13 JAYS a/k/a DR. JAYS.COM, MAGGI FASHION WHOLESALE, INC., BARGIN
14 WHOLESALE CORPORATION a/k/a BARGIN WHOLESALE.COM a/k/a
15 WHOLESALECLOTHING MARKET.COM a/k/a TBWHOLESALE.COM a/k/a
16 TOP BRANDS WHOLESALE a/k/a TOP BRANDS, OZ COMMUNICATIONS,
17 INC. a/k/a CRAZYTEES.NET, SHOP RUMOR, LLC, KEUM SPORTSWEAR
18 CORP., AFRICAN AMERICAN DOLLAR STORE, PROGRESSIVERAGS.COM,
19 SKREENED, LLC, SHIEKH, LLC d/b/a SHIEKH SHOES,
20 INCREDIBLEGIFTS.COM, SHAKY CITY BLUES, MAIN COLLECTION, INC.
21 a/k/a MAIN SPORTSWEAR, MB SPORTSWEAR, RIGHT THANG, BUY
22 MERCHANT, INC. a/k/a BUYMERCHANT.COM, STEAL DEAL, INC.
23 THE WILD SIDE, INC. a/k/a THEWILDSIDE.COM, SETUP SITE, INC. a/k/a
24 HARRINGTON OUTLETS a/k/a OBAMATSHIRTS.US, SOUR CANDY, SHOE
25 BALANCE INTERNATIONAL YAK SHOE INC. a/k/a WHOLESALE
26 SITUATION, WATCH TIME, INC., UNISHOW (USA), INC. a/k/a UNISHOW,
27 INC., AMILINE.COM and GRAVITY TRADING, INC. corporations, limited
28

1 liability companies and/or unincorporated entities that have transacted business in
 2 and/or have committed their infringing activities alleged below in the Central
 3 District of California and/or knew that said activities would affect Bravado, a
 4 California corporation, and/or the Michael Jackson estate, and/or would have an
 5 effect in the Central District of California.

6
 7 3. Upon information and belief, at all relevant times herein, defendants
 8 JIN O. CHA a/k/a JIN CHA, CHANG OH KIM a/k/a CHANG O. KIM a/k/a
 9 CHUCK KIM, JUSTIN JU, SUSAN LEE a/k/a SUSAN YOON, KYUNG SOOK
 10 MA, CESAR IGIESIAS, KAUH UN LEE, ARTHUR BERMAN, DAVID
 11 AHOUBIAN, a/k/a DAVID AHOUBIN a/k/a DAVID AHOUBIM, JAIME
 12 DILLON, NICK PAPARONE, MANSOUR ROKHSARZADEH, AZIZI AFSHIN
 13 a/k/a AFSHIN AZIZI, AHMAD JAMHOUR, OTTO SUAREZ, OLGA LYONS,
 14 ANOOSHKA ZAKARIAN, ESTHER LEE, CHAN SONG LEE, EDNA
 15 CLEMENT SWAN, JACK LEIBERMAN a/k/a JACK LIEBERMAN, DANIEL
 16 CHRISTOPHER FOX, DANIEL LASSOFF, MARIO ONTIVEROS, SU YOUNG
 17 CHO, CHOUNG H. CHOE, HYO JANG YOON, CRAIG N. BENTHAM,
 18 ABRAHAM DAVOOD, MICHAEL DAVOOD, EBBY DAVOOD, KINGSLEY
 19 SYME a/k/a KINGLEY SYMES, JASON AREF, JULIO AREF, AZIZ R. ALI,
 20 GARY CHEN, RENA CHEN, JIAN ZHU and TONY IN CHONG have transacted
 21 business in and/or have committed their infringing activities and/or have overseen
 22 the infringing activities alleged below in the Central District of California and/or
 23 knew that said activities would affect Bravado, a California corporation, and/or the
 24 Michael Jackson estate, and/or would have an effect in the Central District of
 25 California.
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 27
 28

1 8. Plaintiff Bravado has been, at all times relevant herein, engaged in the
2 business of marketing and selling merchandise bearing the names, trade names,
3 trademarks, logos and/or likenesses of musical groups and performers throughout
4 the United States. Plaintiff is selling Michael Jackson merchandise pursuant to an
5 agreement with Triumph International, Inc. ("Triumph"), an entity owned by the
6 Michael Jackson estate, that controls all rights in the Michael Jackson name,
7 likeness, trademark and any other mark and/or indicia associated with Michael
8 Jackson and/or his persona, including, but without limitation to, "King of Pop".
9 Pursuant to said agreement, Bravado has been granted the exclusive right to sell
10 merchandise and commence actions against parties that sell merchandise bearing
11 the Michael Jackson name, likeness, trademark and any other mark and/or indicia
12 associated with Michael Jackson and/or his persona, including King of Pop, and all
13 reproductions rights on said merchandise in copyrighted artwork and/or
14 photographs in which the Michael Jackson estate and/or an entity owned by the
15 Michael Jackson's estate owns the copyright.
16

17
18 9. Defendants are unlicensed distributors who have been distributing and
19 selling unauthorized shirts and/or posters and/or other items bearing the Michael
20 Jackson trademarks (including Michael Jackson and/or King of Pop), the Michael
21 Jackson likeness and/or artwork and/or photographs ("Infringing Merchandise")
22 that lead the consuming public to believe that said items are sponsored by or
23 associated with and/or affiliated with Michael Jackson and/or his estate and/or
24 plaintiff. Said items have been distributed throughout the United States by various
25 means of interstate transport and delivery in violation of plaintiff's rights.
26
27
28

1 10. The sale of the Infringing Merchandise by defendants is and will be
2 without permission or authority of plaintiff or any party representing Michael
3 Jackson or his estate.

4
5 11. Defendants' unlawful activities result in irreparable harm and injury
6 in that, among other things, defendants deprive plaintiff, Triumph and/or the
7 Michael Jackson estate of their absolute right to determine the manner in which the
8 Michael Jackson image is presented to the general public through merchandising;
9 deceives the public as to the source, origin and sponsorship of such merchandise;
10 wrongfully trades upon and cashes in on plaintiff's and Michael Jackson's
11 reputations, commercial value and exclusive rights and it irreparably harms and
12 injures the reputations of plaintiff and Michael Jackson.

13
14
15 **AS AND FOR A FIRST CAUSE OF ACTION**

16 **Violation of 15 U. S. C. 1125(a)**

17
18 12. Plaintiff repeats and realleges paragraphs 1 through 11 of this
19 Complaint as if fully set forth herein.

20
21 13. This cause arises under 15 U.S.C. 1125(a) relating to trademarks,
22 trade names and unfair competition and involves false descriptions in commerce.

23
24 14. The Michael Jackson trademark has been used as a mark in
25 connection with his performing services since 1964 and in connection with the sale
26 of various types of merchandise. As a result of same, the Michael Jackson
27
28

1 trademark has developed and now has a secondary and distinctive trademark
2 meaning to purchasers of merchandise.

3
4 15. Defendants have used the Michael Jackson trademark to sell the
5 Infringing Merchandise containing the Michael Jackson trademark. By
6 misappropriating and using the Michael Jackson trademark, defendants have
7 misrepresented and falsely described to the general public the origin and source of
8 the Infringing Merchandise so as to create the likelihood of confusion by the
9 ultimate purchaser as to both the source and sponsorship of the Infringing
10 Merchandise.

11
12 16. The sale by defendants of the Infringing Merchandise has and will
13 infringe upon and dilute the Michael Jackson trademark.

14
15 17. The use of the Michael Jackson trademark in connection with the sale
16 of the Infringing Merchandise will be damaging to and will dilute the good will
17 generated by Michael Jackson and the reputation that Michael Jackson and plaintiff
18 have developed in connection with the sale of legitimate, authorized and high
19 quality merchandise.

20
21 18. Defendants' unlawful merchandising activities are without permission
22 or authority of plaintiff or anyone authorized to give such consent and constitute
23 express and implied misrepresentations that the Infringing Merchandise was
24 created, authorized or approved by plaintiff and/or Michael Jackson and/or his
25 estate.

1 19. Defendants' aforesaid acts are willful violations of 15 U.S.C. 1125(a)
2 in that the defendants used, in connection with goods and services, a false
3 designation of origin and have caused and will continue to cause said goods (the
4 Infringing Merchandise) to enter into interstate commerce.

5
6 20. Plaintiff will have no adequate remedy at law if defendants' activities
7 are not enjoined and plaintiff and/or Michael Jackson and/or his estate will suffer
8 irreparable harm and injury to plaintiff's and Michael Jackson's images and
9 reputations as a result thereof.

10
11 21. As a result of defendants' activities, plaintiff has been damaged in an
12 amount not yet determined or ascertainable.

13
14 **AS AND FOR A SECOND CAUSE OF ACTION**

15 **Violation of 15 U. S. C. 1125(a)**

16
17
18 22. Plaintiff repeats and realleges paragraphs 1 through 11 and 13 through
19 21 of this Complaint as if fully set forth herein.

20
21 23. This cause arises under 15 U.S.C. 1125(a) relating to trademarks,
22 trade names and unfair competition and involves false descriptions in commerce.

23
24 24. The King of Pop trademark has been associated with Michael
25 Jackson's performing services and has been used by Michael Jackson and/or the
26 Michael Jackson estate in connection with the sale of various types of
27 merchandise. As a result of the same, the King of Pop mark has developed and
28

1 now has a distinctive trademark meaning to purchasers of merchandise and/or said
2 mark would be falsely associated with Michael Jackson and/or his estate if it was
3 used by defendants.
4

5 25. Some defendants herein have used the King of Pop trademark to sell
6 the Infringing Merchandise. By using the King of Pop mark, defendants have
7 misrepresented and falsely described to the general public the origin and source of
8 the Infringing Merchandise so as to create the likelihood of confusion by the
9 ultimate purchaser as to both the source and sponsorship of the Infringing
10 Merchandise and/or are attempting to falsely associate themselves and/or their
11 merchandise with plaintiff, Michael Jackson and/or the Michael Jackson estate.
12

13
14 26. Defendants' unlawful merchandising activities are without permission
15 or authority of plaintiff or anyone authorized to give such consent and constitutes
16 express and implied misrepresentations that the Infringing Merchandise was
17 created, authorized or approved by plaintiff and/or Michael Jackson and/or his
18 estate.
19

20 27. The aforesaid acts of defendants are willful violations of 15 U.S.C.
21 1125(a) in that the defendants used, in connection with goods and services, a false
22 designation of origin and have caused and will continue to cause said goods (the
23 Infringing Merchandise) to enter into interstate commerce.
24

25 28. Plaintiff will have no adequate remedy at law if defendants' activities
26 are not enjoined and plaintiff and Michael Jackson and/or his estate will suffer
27
28

1 irreparable harm and injury to plaintiff's and Michael Jackson's images and
2 reputations as a result thereof.

3
4 29. As a result of defendants' activities, plaintiff has been damaged in an
5 amount not yet determined or ascertainable.
6

7 **AS AND FOR A THIRD CAUSE OF ACTION**

8 **Violation of Common Law Unfair Competition**
9

10 30. Plaintiff repeats and realleges paragraphs 1 through 11, 13 through 21
11 and 23 through 29 of this Complaint as if fully set forth herein.
12

13 31. The use of the Michael Jackson and/or King of Pop trademarks by
14 defendants in connection with the sale of the Infringing Merchandise is likely to,
15 and is certainly intended to, cause confusion to purchasers.
16

17 32. Defendants, by misappropriating and using the Michael Jackson
18 and/or King of Pop trademarks, have utilized unfair means to usurp the good will
19 and distinctive attributes of the Michael Jackson and King of Pop trademarks.
20
21

22 33. Defendants have misrepresented and falsely described to the general
23 public the origin and source of the Infringing Merchandise so as to cause confusion
24 by the ultimate purchaser as to both the source, sponsorship and/or association of
25 the Infringing Merchandise.
26
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1 34. Plaintiff will have no adequate remedy at law if defendants' activities
2 are not enjoined and plaintiff and Michael Jackson and/or his estate will suffer
3 irreparable harm and injury to plaintiff's and Michael Jackson's images and
4 reputations as a result thereof.

5
6 35. As a result of defendants' aforesaid activities, plaintiff has been
7 damaged in an amount not yet determined or ascertainable.
8

9 **AS AND FOR A FOURTH CAUSE OF ACTION**

10 **Trademark Dilution Under 15 U.S.C. 1125(c)**
11

12 36. Plaintiff repeats and realleges paragraphs 1 through 11, 13 through 21,
13 23 through 29 and 31 through 35 of this Complaint as if fully set forth herein.
14

15 37. By virtue of Michael Jackson's long and continuous use of the
16 Michael Jackson trademark in interstate commerce, said mark has become and
17 continues to be famous within the meaning of 15 U.S.C. 1125(c). As such said
18 mark is eligible for protection against dilution pursuant to 15 U.S.C. 1125(c).
19

20 38. Defendants' use of the Michael Jackson mark in connection with the
21 merchandise that they are selling has threatened to cause and is causing dilution of
22 the distinctive quality of the famous Michael Jackson mark by lessening plaintiff's,
23 Triumph's and the Michael Jackson estate's capacity to identify the goods in
24 violation of 15 U.S.C. 1125(c).
25
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1 39. Plaintiff will have no adequate remedy at law if defendants' activities
2 are not enjoined and plaintiff and Michael Jackson and/or his estate will suffer
3 irreparable harm and injury to plaintiff's and Michael Jackson's images and
4 reputations as a result thereof.

5
6 40. As a result of defendants' activities, plaintiff has been damaged in an
7 amount not yet determined or ascertainable.

8
9 **AS AND FOR A FIFTH CAUSE OF ACTION**

10 **Copyright Infringement**

11
12 41. Plaintiff repeats and realleges paragraphs 1 through 11, 13 through 21,
13 23 through 29, 31 through 35 and 37 through 40 of this Complaint as if fully set
14 forth herein.

15
16 42. Plaintiff has been granted the exclusive reproduction rights in
17 merchandise, including, without limitation to, shirts, hats, posters and watches in
18 and to the following works that have been registered with the United States
19 Register of Copyrights (copies of records of said registrations are annexed hereto
20 as Exhibit A):

- 21
22 (A) Thriller, Registration No. SR-41-965, Registered January 27, 1983;
23 (B) The Official Michael Jackson 1985 Calendar , VA0000171520,
24 Registered October 22, 1985;
25 (C) Bad, Registration No. SR0000084256, Registered November 4, 1987;
26 (D) Dangerous, Registration No. SR0000178165, Registered February
27 10, 1992;
28

- 1 (E) Invincible, Registration No. SR0000304780, Registered January 15,
2 2002;
- 3 (F) Thriller, Registration No. SR0000304788, Registered January 15,
4 2002;
- 5 (G) Number Ones, Registration No. SR0000343627, Registered
6 December 17, 2003;
- 7 (H) Essential Michael Jackson, Registration No. SR0000378665,
8 Registered October 5, 2005; and
- 9 (I) The Ultimate Collection, Registration No. SR0000385428, Registered
10 December 27, 2005.
11

12
13 43. Plaintiff and/or the copyright owner of said registrations have
14 complied in all respects with Title 17 of the United States Code. Plaintiff and/or
15 the copyright owner of said registrations have secured the exclusive rights and
16 privileges in and to the copyrights in the works as set forth above.
17

18 44. At all relevant times herein, plaintiff owned and still owns the entire
19 right, title and interest in and to the reproduction rights in the respective copyrights
20 as set forth above on the goods that defendants have been selling.
21

22 45. Defendants have wrongfully copied, distributed and/or sold shirts
23 and/or posters and/or other items displaying the works set forth in paragraph 42
24 above. Such copying, distribution and/or sale of said goods by defendants
25 constitutes willful and deliberate infringement of plaintiff's rights in the aforesaid
26 copyrights.
27
28

1 46. If defendants' activities are not enjoined, plaintiff and/or Michael
2 Jackson and/or his estate will suffer irreparable harm and injury.

3
4 47. As a result of defendant's activities, plaintiff has been damaged in an
5 amount not yet determined or ascertainable.

6
7 **AS AND FOR A SIXTH CAUSE OF ACTION**
8 **Violation of Section 3344.1 of the California Civil Code**
9

10 48. Plaintiff repeats and realleges paragraphs 1 through 11, 13 through 21,
11 23 through 29, 31 through 35, 37 through 40 and 42 through 47 of this Complaint
12 as if fully set forth herein.
13

14
15 49. Michael Jackson was a celebrated musical performer with a
16 proprietary interest, inter alia, in the use in public of his name and likeness.
17 Michael Jackson died on June 25, 2009. On July 15, 2009, John Branca and John
18 McClain, the special administrators of the estate of Michael Jackson, on behalf of
19 the Michael Jackson estate, registered a claim pursuant to California Civil Code
20 Section 3344.1. Triumph, an entity wholly owned by the Michael Jackson estate,
21 has granted the exclusive right to Bravado to use the Michael Jackson likeness in
22 connection with merchandise including shirts, posters and watches.
23

24 50. Defendants have used the Michael Jackson name and likeness in
25 connection with the sale and distribution of the Infringing Merchandise.
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1 51. Neither plaintiff nor Triumph nor any party acting on behalf of the
2 Michael Jackson estate has given oral or written consent to defendants for the use
3 of Michael Jackson's name and/or likeness.
4

5 52. Defendants have violated Section 3344.1 by knowingly appropriating,
6 using and exploiting the Michael Jackson name and likeness in connection with
7 commercial exploitation and/or advertisement of the Infringing Merchandise that
8 they have distributed for their commercial benefit without the consent of plaintiff
9 or any party authorized to give such consent.
10

11 53. As a result, defendants have deprived plaintiff and the Michael
12 Jackson estate of the right to control the time, place, terms and manner by which
13 to publicize his special talents.
14

15 54. The use of the Michael Jackson name and likeness in connection with
16 the sale and distribution of Infringing Merchandise by defendants has caused, is
17 causing and will continue to cause plaintiff and/or Michael Jackson and/or his
18 estate irreparable harm and injury. If defendants' activities are not enjoined,
19 plaintiff and/or Michael Jackson and/or his estate will suffer irreparable harm and
20 injury.
21

22 55. As a result of defendants' activities, plaintiff has been damaged in an
23 amount not yet determined or ascertainable.
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1 **AS AND FOR A SEVENTH CAUSE OF ACTION**

2 **Violation of Common Law Right of Publicity**

3
4 56. Plaintiff repeats and realleges paragraphs 1 through 11, 13 through
5 21, 23 through 29, 31 through 35, 37 through 40, 42 through 47 and 49 through 55
6 of this Complaint as if fully set forth herein.
7

8 57. Defendants' unauthorized use of the Michael Jackson name and
9 likeness constitutes common law right of publicity violations.
10

11 58. Plaintiff will have no adequate remedy at law if defendants' activities
12 are not enjoined and plaintiff and Michael Jackson and/or his estate will suffer
13 irreparable harm and injury to plaintiff's and Michael Jackson's images and
14 reputations as a result thereof.
15

16
17 59. As a result of defendants' activities, plaintiff has been damaged in an
18 amount not yet determined or ascertainable.
19

20 **AS AND FOR A EIGHTH CAUSE OF ACTION**

21 **Unfair Competition Under Cal. Bus. & Prof. Code Section 17200 et seq.**

22
23 60. Plaintiff repeats and realleges paragraphs 1 through 11, 13 through
24 21, 23 through 29, 31 through 35, 37 through 40, 42 through 47, 49 through 55
25 and 57 through 59 of this Complaint as if fully set forth herein.
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1 61. Defendants' acts, as alleged herein, have impaired plaintiff's
2 goodwill, have created a likelihood of confusion, and have otherwise adversely
3 affected plaintiff's business and reputation. These acts constitute unfair
4 competition in violation of California Business and Professions Code §§ 17200 et
5 seq. and California common law.

6
7 62. Defendants' conduct constitutes misappropriation of plaintiff's
8 trademarks and the goodwill associated therewith.

9
10 63. Plaintiff will have no adequate remedy at law if defendants' activities
11 are not enjoined and plaintiff and Michael Jackson and/or his estate will suffer
12 irreparable harm and injury to plaintiff's and Michael Jackson's images and
13 reputations as a result thereof.

14
15 64. As a result of defendants' activities, plaintiff has been damaged in an
16 amount not yet determined or ascertainable.

17
18 WHEREFORE, Plaintiff respectfully prays that this Court grant the following
19 relief:

20
21 A. A Preliminary Injunction restraining, enjoining and prohibiting each
22 of the defendants from using the Michael Jackson name, trademarks, likeness
23 and/or copyright artwork and/or photographs and/or the King of Pop mark and/or
24 anything confusingly similar thereto in connection with manufacturing, distributing
25 or sale of any and all merchandise;

1 B. A Permanent Injunction prohibiting defendants from selling or
2 attempting to sell the aforesaid merchandise;

3
4 C. Three times defendants' profits or three times the damages suffered by
5 plaintiff or the Michael Jackson estate, whichever is greater, and reasonable
6 attorneys fees and the costs of the action;

7
8 D. Statutory damages of no less than \$750.00 for each name and/or
9 likeness that each defendant has used on each different product plus punitive
10 damages and attorneys' fees pursuant to California Civil Code Section 3344;

11
12 E. Defendants' profits or damages suffered by plaintiff or Michael
13 Jackson, whichever is greater, plus punitive damages pursuant to the Third Cause
14 of Action;

15
16 F. Statutory damages of \$150,000.00 pursuant to the Fifth Cause of
17 Action for each copyrighted work set forth in paragraph 42 above that defendants
18 infringed on each different product on which defendants copied each copyrighted
19 work; and
20
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1 G. Such other and further relief that this Court deems to be just and
2 proper.
3

4 Dated: December 9, 2009
5 Los Angeles, CA
6

Respectfully submitted,

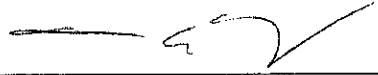
By: 
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EXHIBIT A

CERTIFICATE OF COPYRIGHT REGISTRATION

FORM SR

UNITED STATES COPYRIGHT OFFICE



This certificate, issued under the seal of the Copyright Office in accordance with the provisions of section 410(a) of title 17, United States Code, attests that copyright registration has been made for the work identified below. The information in this certificate has been made a part of the Copyright Office records.

David Ladd

REGISTER OF COPYRIGHTS
United States of America

REGISTRATION NUMBER	
SR	41-965
EFFECTIVE DATE OF REGISTRATION	
Jan	27, 1983
(Month)	(Day) (Year)

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE CONTINUATION SHEET (FORM SR/CON)

1

Title

TITLE OF THIS WORK: THRILLER
Artist: MICHAEL JACKSON

Catalog number of sound recording, if any: OE 38112

PREVIOUS OR ALTERNATIVE TITLES:

NATURE OF MATERIAL RECORDED:
(Check Which)

☒ Musical ☐ Musical-Dramatic
☐ Dramatic ☐ Literary
☐ Other

2

Author(s)

IMPORTANT: Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (see instructions). If any part of this work was "made for hire" check "Yes" in the space provided, give the employer (or other person for whom the work was prepared) as "Author" of that part, and leave the space for dates blank.

NAME OF AUTHOR: Mr. Michael Jackson

DATES OF BIRTH AND DEATH:

Born (Year) Died (Year)

Was this author's contribution to the work a "work made for hire"? Yes..... No ☒.....

AUTHOR'S NATIONALITY OR DOMICILE:

Citizen of U.S.A. or Domiciled in U.S.A.
(Name of Country) (Name of Country)

AUTHOR OF: (Briefly describe nature of this author's contribution) Some new sounds, all new photographic matter & artwork

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK:

Anonymous? Pseudonymous?
Yes..... No ☒..... Yes..... No ☒.....

If the answer to either of these questions is "Yes," see detailed instructions attached.

NAME OF AUTHOR:

DATES OF BIRTH AND DEATH:

Born (Year) Died (Year)

Was this author's contribution to the work a "work made for hire"? Yes..... No.....

AUTHOR'S NATIONALITY OR DOMICILE:

Citizen of (Name of Country) or Domiciled in (Name of Country)

AUTHOR OF: (Briefly describe nature of this author's contribution)

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK:

Anonymous? Pseudonymous?
Yes..... No..... Yes..... No.....

If the answer to either of these questions is "Yes," see detailed instructions attached.

NAME OF AUTHOR:

DATES OF BIRTH AND DEATH:

Born (Year) Died (Year)

Was this author's contribution to the work a "work made for hire"? Yes..... No.....

AUTHOR'S NATIONALITY OR DOMICILE:

Citizen of (Name of Country) or Domiciled in (Name of Country)

AUTHOR OF: (Briefly describe nature of this author's contribution)

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK:

Anonymous? Pseudonymous?
Yes..... No..... Yes..... No.....

If the answer to either of these questions is "Yes," see detailed instructions attached.

3

Creation and Publication

YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED:

Year 1982

(This information must be given in all cases.)

DATE AND NATION OF FIRST PUBLICATION:

Date November 19, 1982
(Month) (Day) (Year)

Nation U.S.A.
(Name of Country)

(Complete this block ONLY if this work has been published.)

4

Claimant(s)

NAME(S) AND ADDRESS(ES) OF COPYRIGHT CLAIMANT(S):

CBS Inc.
51 West 52nd Street
New York, New York 10019

TRANSFER: (If the copyright claimant(s) named here in space 4 are different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright.)

DO NOT WRITE

<div style="display: flex; justify-content: space-between; align-items: center;"> SR 41-965 </div>	EXAMINED BY: <u>RW</u> CHECKED BY: _____ CORRESPONDENCE: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	APPLICATION RECEIVED: <u>27 JAN 1983</u> DEPOSIT RECEIVED: <u>27 JAN 1983</u> REMITTANCE NUMBER AND DATE:	FOR COPYRIGHT OFFICE USE ONLY
--	--	---	---

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED ADDITIONAL SPACE, USE CONTINUATION SHEET (FORM SR/CON)

PREVIOUS REGISTRATION: • Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office? Yes No X • If your answer is "Yes," why is another registration being sought? (Check appropriate box) <input type="checkbox"/> This is the first published edition of a work previously registered in unpublished form. <input type="checkbox"/> This is the first application submitted by this author as copyright claimant. <input type="checkbox"/> This is a changed version of the work, as shown by line 6 of the application. • If your answer is "Yes," give: Previous Registration Number Year of Registration	<div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; line-height: 30px; margin: 0 auto;">5</div> Previous Registration
---	--

COMPILATION OR DERIVATIVE WORK: (See instructions) PREEXISTING MATERIAL: (Identify any preexisting work or works that the work is based on or incorporates.) <u>A--THE GIRL IS MINE 34-03288.....</u> <u>LYRICS ON INNER SLEEVE.....</u> MATERIAL ADDED TO THIS WORK: (Give a brief, general statement of the material that has been added to this work and in which copyright is claimed.) <u>ALL NEW PHOTOGRAPHIC MATTER & ARIWORK, SOME NEW SOUNDS:</u> <u>Side 1...Bds...(1)WANNA BE STARTIN' SOMETHIN' (2)BABY BE MINE (4)THRILLER.....</u> <u>Side 2...Bds...(1)BEAT IT (2)BILLIE JEAN (3)HUMAN NATURE (4)P.Y.T... (PRETTY YOUNG THING) (5)THE LADY IN MY LIFE.....</u>	<div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; line-height: 30px; margin: 0 auto;">6</div> Compilation or Derivative Work
--	---

DEPOSIT ACCOUNT: (If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.) Name <u>CBS Inc.</u> Account Number <u>DA016292</u>	CORRESPONDENCE: (Give name and address to which correspondence about this application should be sent.) Name <u>CBS, Law Registry/Barbara Lesko</u> Address <u>51 West 52nd Street</u> <u>New York, New York 10019</u> <small>(City) (State) (ZIP)</small>	<div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; line-height: 30px; margin: 0 auto;">7</div> Fee and Correspondence
--	---	---

CERTIFICATION: * I, the undersigned, hereby certify that I am the (Check one) <input type="checkbox"/> author <input type="checkbox"/> other copyright claimant <input type="checkbox"/> owner of exclusive right(s) <input checked="" type="checkbox"/> authorized agent of <u>CBS, Inc.</u> the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge. <div style="display: flex; justify-content: space-between; align-items: flex-end;"> <div style="text-align: center;"> Handwritten signature (X) Typed or printed name: <u>Barbara Lesko</u> </div> <div style="text-align: right;"> Date: <u>1/24/83</u> </div> </div>	<div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; line-height: 30px; margin: 0 auto;">8</div> Certification (Application must be signed)
--	---

<div style="border: 1px solid black; padding: 10px; border-radius: 10px;"> <u>CBS, Law Registry/Att: Barbara Lesko</u> <u>51 West 52nd Street</u> <small>(Number, Street and Apartment Number)</small> <u>New York, New York 10019</u> <small>(City) (State) (ZIP code)</small> </div>	<div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; line-height: 30px; margin: 0 auto;">9</div> Address For Return of Certificate
--	--

MAIL CERTIFICATE TO
 (Certificate will be mailed in window envelope)

FORM VA

UNITED STATES COPYRIGHT OFFICE

REGISTRATION NUMBER

VA VAU

EFFECTIVE DATE OF REGISTRATION

Month Day Year

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

TITLE OF THIS WORK

THE OFFICIAL MICHAEL JACKSON 1985 CALENDAR

NATURE OF THIS WORK

See instructions

Photographs/Calendar

PREVIOUS OR ALTERNATIVE TITLES

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work

If published in a periodical or serial give: Volume Number Issue Date On Pages

NAME OF AUTHOR

MJJ Productions, Inc.

DATES OF BIRTH AND DEATH

Year Born Year Died

Was this contribution to the work a "work made for hire"? ☒ Yes ☐ No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country

OR Citizen of United States Domiciled in

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? ☐ Yes ☒ No

Pseudonymous? ☐ Yes ☒ No

If the answer to either of these questions is "Yes," see detailed instructions

NATURE OF AUTHORSHIP

entire work

Briefly describe nature of the material created by this author in which copyright is claimed.

NAME OF AUTHOR

DATES OF BIRTH AND DEATH

Year Born Year Died

Was this contribution to the work a "work made for hire"? ☐ Yes ☐ No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country

OR Citizen of Domiciled in

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? ☐ Yes ☐ No

Pseudonymous? ☐ Yes ☐ No

If the answer to either of these questions is "Yes," see detailed instructions

NATURE OF AUTHORSHIP

Briefly describe nature of the material created by this author in which copyright is claimed.

NAME OF AUTHOR

DATES OF BIRTH AND DEATH

Year Born Year Died

Was this contribution to the work a "work made for hire"? ☐ Yes ☐ No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country

OR Citizen of Domiciled in

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? ☐ Yes ☐ No

Pseudonymous? ☐ Yes ☐ No

If the answer to either of these questions is "Yes," see detailed instructions

NATURE OF AUTHORSHIP

Briefly describe nature of the material created by this author in which copyright is claimed.

YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED 1984

This information must be given in all cases.

DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

Complete this information ONLY if this work has been published.

Month July Day 30 Year 1984

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2.

MJJ Productions, Inc.
c/o Ziffren, Brittenham & Gullen
2049 Century Park East, Los Angeles, CA 90067

TRANSFER If the claimant(s) named here in space 4 are different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright.

APPLICATION RECEIVED

ONE DEPOSIT RECEIVED

TWO DEPOSITS RECEIVED

REMITTANCE NUMBER AND DATE

MORE ON BACK

Complete all applicable spaces (numbers 3-5) on the reverse side of this page.
See detailed instructions. Sign the form at the B.

Page 1 of 1 pages

1

2

NOTE

Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (see instructions). For any part of this work that was "made for hire" check "Yes" in the space provided, give the employer (or other person for whom the work was prepared) as "Author" of that part, and leave the space for dates of birth and death blank.

3
4

See instructions before completing this space.

DO NOT WRITE HERE OFFICE USE ONLY

EXAMINED BY _____

FORM VA

CHECKED BY _____

☐ CORRESPONDENCE
Yes☐ DEPOSIT ACCOUNT
FUNDS USEDFOR
COPYRIGHT
OFFICE
USE
ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

- ☐ Yes ☒ No If your answer is "Yes," why is another registration being sought? (Check appropriate box) ▼
- ☐ This is the first published edition of a work previously registered in unpublished form.
- ☐ This is the first application submitted by this author as copyright claimant.
- ☐ This is a changed version of the work, as shown by space 6 on this application.
- If your answer is "Yes," give: Previous Registration Number ▼ Year of Registration ▼

DERIVATIVE WORK OR COMPILATION Complete both space 6a & 6b for a derivative work; complete only 6b for a compilation.a. **Preexisting Material** Identify any preexisting work or works that this work is based on or incorporates. ▼

Photographs have been previously published in slightly different form.

b. **Material Added to This Work** Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

Compilation, editing.

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.
Name ▼ Account Number ▼

Simon & Schuster, Inc.

DA013137

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/Zip ▼
see below

Area Code & Telephone Number ▼ (212) 245-6400 x 1388

CERTIFICATION I, the undersigned, hereby certify that I am the

Check only one ▼

- ☐ author
- ☐ other copyright claimant
- ☐ owner of exclusive right(s)

☒ authorized agent of Simon & Schuster, Inc.
Name of author or other copyright claimant, or owner of exclusive right(s) ▼

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Typed or printed name and date ▼ If this is a published work, this date must be the same as or later than the date of publication given in space 3.
Victoria Woods date 9/27/84

Handwritten signature (X) ▼

**MAIL
CERTIFI-
CATE TO**Certificate
will be
mailed in
window
envelope

Name ▼

Victoria Woods, Simon & Schuster, Inc.

Number/Street/Apartment Number ▼

1230 Avenue of the Americas

City/State/ZIP ▼

New York, New York 10020

Have you:

- Completed all necessary spaces?
- Signed your application in space 8?
- Enclosed check or money order for \$10 payable to Register of Copyrights?
- Enclosed your deposit material with the application and fee?


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Library of Congress, Washington,
D.C. 20559.








* 17 U.S.C. § 506(e): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.



U.S. GOVERNMENT PRINTING OFFICE: 1983; 361-279/504


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Bad SR0000084256

SR0000084256

Bad / [performed by] Michael Jackson

ADDITIONAL TITLES: The way you make me feel

OWNER: M J J Productions, Inc.

APPLICATION AUTHOR: sound recording: M J J Productions, Inc., employer for hire.

AUTHOR: Jackson, Michael author; Emerson, Sam author; Gorman, Greg author; Rolston, Matthew author; **MJJ Productions, Inc.** author claimant

CLASS: Sound Recordings

RETRIEVAL CODE: U Sound recording

STATUS: Registered

REGISTRATION DATE: November 04, 1987

CREATED: 1987

PUBLICATION DATE: 1987-08-19

NEW MATTER: all photographic matter, some sound recordings, bands 1-7, 9 & 10.

CONTENTS: Bad

- The way you make me feel
- Speed demon
- Liberian girl
- Just good friends
- Another part of me
- Man in the mirror
- I just can't stop loving you
- Dirty Diana
- Smooth criminal
- Leave me alone

REGISTRATION DEPOSIT: 1 sound disc : digital ; 5 in. + 1 booklet.

IMPRINT: Epic EK 40600 c1987.

NLS/BPH: No rights granted to produce copies in alternative medium


NOTES: General note / or Document Header for Recorded Document: Compact disc.

General note / or Document Header for Recorded Document: Photos.: Sam Emerson, Greg Gorman & Matthew Rolston.

PREVIOUS REGISTRATION: Preexisting material: Band 8

MISCELLANEOUS:

DATE OF CREATION: Single date created: 1987

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Source: [Legal](#) > / ... / > U.S. Copyrights Combined Files Terms: name(mjj productions) ([Edit Search](#) | [Suggest Terms for My Search](#))☒ Select for FOCUS™ or Delivery*Dangerous SR0000178165*

SR0000178165

Dangerous

OWNER: on sound recording & pictorial art; **MJJ Productions, Inc.** (employer for hire)AUTHOR: Jackson, Michael author; Ryden, Mark author; **MJJ Productions, Inc.** author claimant

CLASS: Sound Recordings

RETRIEVAL CODE: U Sound recording

STATUS: Registered

REGISTRATION DATE: February 10, 1992

CREATED: 1991

PUBLICATION DATE: 1991-11-22

CAST: Performed by Michael Jackson

CONTENTS: Jam

Why you wanna trip on me
 In the closet
 She drives me wild
 Remember the time
 Can't let her get away
 Heal the world
 Black or white
 Who is it
 Give in to me
 Will you be there
 Keep the faith
 Gone too soon
 Dangerous

REGISTRATION DEPOSIT: Compact disc.

IMPRINT: Epic EK 45400 c1991.

NLS/BPH: No rights granted to produce copies in alternative medium


NOTES: General note / or Document Header for Recorded Document: Ill. Mark Ryden.

Participant or performer note: Performed by Michael Jackson.

Copyright note includes annotation: C.O. correspondence.

MISCELLANEOUS:

DATE OF CREATION: Single date created: 1991

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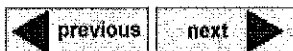
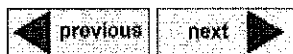
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Public Catalog

Copyright Catalog (1978 to present)

Search Request: Left Anchored Name = mjj productions

Search Results: Displaying 14 of 45 entries

[Labeled View](#)*Invincible / Michael Jackson.***Type of Work:** Sound Recording**Registration Number / Date:** SR0000304780 / 2002-01-15**Title:** Invincible / Michael Jackson.**Imprint:** c2001.**Publisher Number:** Epic EK 64900**Description:** Compact disc.**Notes:** Photo: Albert Watson.**Copyright Claimant:** © ☐ MJJ Productions, Inc. (employer for hire)**Date of Creation:** 2001**Date of Publication:** 2001-10-17**Previous Registration:** Preexisting material: one sound recording track 6; some sampled sounds, ills.**Basis of Claim:** New Matter: all other sound recordings; photographic matter.**Contents:** Unbreakable -- Heartbreaker -- Invincible -- Break of dawn -- Heaven can wait -- You rock my world -- Butterflies -- Speechless -- 2000 watts -- You are my life -- Privacy -- Don't walk away -- Cry -- The lost children -- Whatever happens -- Threatened.**Other Title:** The lost children**Names:** Jackson, MichaelWatson, AlbertMJJ Productions, Inc.**Save, Print and Email (Help Page)**

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Terms: EXPAND-TITLE(thriller michael jackson) (Edit Search | Suggest Terms for My Search)

Select for FOCUS™ or Delivery



Thriller SR0000304788

SR0000304788

Thriller / Michael Jackson

OWNER: MJJ Productions, Inc. (employer for hire)

AUTHOR: Jackson, Michael author; MJJ Productions, Inc. author claimant

CLASS: Sound Recordings

RETRIEVAL CODE: U Sound recording

STATUS: Registered

REGISTRATION DATE: January 15, 2002

CREATED: 2001

PUBLICATION DATE: 2001-10-03

NEW MATTER: compilation of sound recordings & photos; some new recordings.

REGISTRATION DEPOSIT: Compact disc.

EDITION: Special ed.

IMPRINT: Epic EK 66073 c2001.

NLS/BPH: No rights granted to produce copies in alternative medium

PREVIOUS REGISTRATION: Preexisting material: basic sounds & photos

MISCELLANEOUS:

DATE OF CREATION: Single date created: 2001

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Terms: EXPAND-TITLE(thriller michael jackson) (Edit Search | Suggest Terms for My Search)

View: Full

Date/Time: Monday, August 17, 2009 - 10:41 AM EDT

Number ones / Michael Jackson.

Type of Work: Sound Recording

Registration Number / Date: SR0000343627 / 2003-12-17

Title: Number ones / Michael Jackson.

Imprint: c2003.

Publisher Number: Epic EK 88998

Description: Compact disc.

Copyright Claimant: © © MJJ Productions, Inc. (employer for hire)

Date of Creation: 2003

Date of Publication: 2003-11-12

Basis of Claim: New Matter: compilation of preexisting recordings & of preexisting photographic matter, new recording: One more chance.

Other Title: One more chance

Names: Jackson, Michael

MJJ Productions, Inc.

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Source: [Legal](#) > /.../ > [U.S. Copyrights Combined Files](#) [i](#)
Terms: CLAIMANT(mjj productions) ([Edit Search](#) | [Suggest Terms for My Search](#))

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☐

Essential Michael Jackson SR0000378665

SR0000378665

Essential Michael Jackson / by Michael Jackson

OWNER: MJJ Productions, Inc., employer for hire

AUTHOR: Jackson, Michael author; MJJ Productions, Inc. author claimant

CLASS: Sound Recordings

RETRIEVAL CODE: U Sound recording

STATUS: Registered

REGISTRATION DATE: October 05, 2005

CREATED: 2005

PUBLICATION DATE: 2005-07-06

NEW MATTER: compilation of sound recording & of photographic matter.

NOTES: Copyright note includes annotation: Cataloged from appl. only.

PREVIOUS REGISTRATION: Preexisting material: basic sounds & photos

MISCELLANEOUS:

DATE OF CREATION: Single date created: 2005

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Terms: CLAIMANT(mjj productions) ([Edit Search](#) | [Suggest Terms for My Search](#))
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8/17/2009

Copyright

United States Copyright Office

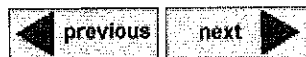
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Public Catalog

Copyright Catalog (1978 to present)

Search Request: Left Anchored Name = mjj productions

Search Results: Displaying 29 of 45 entries

[Labeled View](#)*Michael Jackson: the ultimate collection / Michael Jackson.***Type of Work:** Sound Recording**Registration Number / Date:** SR0000385428 / 2005-12-27**Title:** Michael Jackson: the ultimate collection / Michael Jackson.**Copyright Claimant:** © ☐ MJJ Productions, Inc., employer for hire**Date of Creation:** 2004**Date of Publication:** 2004-11-03**Previous Registration:** Preexisting material: basic sounds, basic photos, some sampled sounds.**Basis of Claim:** New Matter: compilation of sound recordings, some new sound recordings (disc 1: track 17, disc 2: tracks 6, 9-11, disc 3: tracks 7-9, disc 4: tracks 6, 7 & 11) & compilation of photographic matter.**Copyright Note:** Cataloged from appl. only.**Names:** Jackson, MichaelMJJ Productions, Inc.**Save, Print and Email (Help Page)**Select Download Format ☐ Full Record☐ Format for Print/Save

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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge Philip S. Gutierrez and the assigned discovery Magistrate Judge is Carla Woehrle.

The case number on all documents filed with the Court should read as follows:

CV09- 9066 PSG (CWx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

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NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

☒ **Western Division**
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

☐ **Southern Division**
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

☐ **Eastern Division**
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

BRAVADO INTERNATIONAL GROUP
MERCHANDISING SERVICES, INC.

PLAINTIFF(S)

v.

SEE ATTACHED

DEFENDANT(S).

CASE NUMBER

CV09 09066 PSG (CWx)

SUMMONS

TO: DEFENDANT(S): SEE ATTACHED

A lawsuit has been filed against you.

Within 20 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☒ complaint ☐ _____ amended complaint ☐ counterclaim ☐ cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Kenneth A. Feinswog, whose address is 6701 Center Drive West, Suite 610, Los Angeles CA 90045, Telephone: 310-846-5800. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

CHRISTOPHER POWERS

Dated: _____

DEC 10 2009

By: _____

Deputy Clerk

(Seal of the Court)

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

DEFENDANTS:

JIN O. CHA a/k/a JIN CHA, OK SPORTSWEAR, EZ SPORTSWEAR, CHANG OH KIM a/k/a CHANG O. KIM a/k/a CHUCK KIM, EDEN SPORTS, INC., JUSTIN JU, SY SPORTS, SUSAN LEE a/k/a SUSAN YOON, LEE'S FAMILY, INC., GREEN T CORP., KYUNG SOOK MA, CESAR IGIESIAS, BLING BLING, INC., KAUH UN LEE, ARTHUR BERMAN, WACKY PLANET a/k/a WACKYPLANET.COM, a/k/a THEPLANETSHOPS.COM, DAVID AHOUBIAN, a/k/a DAVID AHOUBIN a/k/a DAVID AHOUBIM, D&T DISTRIBUTION, PARIS FASHIONS, CLOTHING ISLAND a/k/a CLOTHINGISLAND.COM, PRINT LIBERATION, JAIME DILLON, NICK PAPARONE, DR. JAY'S, INC. a/k/a DR. JAYS a/k/a DR. JAYS.COM, MAGGI FASHION WHOLESALE, INC., MANSOUR ROKHSARZADEH, AZIZI AFSHIN a/k/a AFSHIN AZIZI, BARGIN WHOLESALE CORPORATION a/k/a BARGIN WHOLESALE.COM a/k/a WHOLESALECLOTHING MARKET.COM a/k/a TBWHOLESALE.COM a/k/a TOP BRANDS WHOLESALE a/k/a TOP BRANDS, AHMAD JAMHOUR, OZ COMMUNICATIONS, INC. a/k/a CRAZYTEES.NET, OTTO SUAREZ, OLGA LYONS, SHOP RUMOR, LLC, ANOOSHKA ZAKARIAN, ESTHER LEE, KEUM SPORTSWEAR CORP., CHAN SONG LEE, AFRICAN AMERICAN DOLLAR STORE, EDNA CLEMENT SWAN, JACK LIEBERMAN a/k/a JACK LIEBERMAN, PROGRESSIVERAGS.COM, SKREENED, LLC, DANIEL CHRISTOPHER FOX, SHIEKH, LLC d/b/a SHIEKH SHOES, INCREDIBLEGIFTS.COM, DANIEL LASSOFF, SHAKY CITY BLUES, MARIO ONTIVEROS, MAIN COLLECTION, INC. a/k/a MAIN SPORTSWEAR, SU YOUNG CHO, MB SPORTSWEAR, CHOUNG H. CHOE, RIGHT THANG, HYO JANG YOON, BUY MERCHANT, INC. a/k/a BUYMERCHANT.COM, CRAIG N. BENTHAM, STEAL DEAL, INC. ABRAHAM DAVOOD, MICHAEL DAVOOD, EBBY DAVOOD, THE WILD SIDE, INC. a/k/a THEWILDSIDE.COM, KINGSLEY SYME a/k/a KINGLEY SYMES, SETUP SITE, INC. a/k/a HARRINGTON OUTLETS a/k/a OBAMATSHIRTS.US, SOUR CANDY, SHOE BALANCE INTERNATIONAL YAK SHOE INC. a/k/a WHOLESALE SITUATION, JASON AREF, JULIO AREF, WATCH TIME, INC., AZIZ R. ALI, UNISHOW (USA), INC. a/k/a UNISHOW, INC., GARY CHEN, RENA CHEN, AMILINE.COM, JIAN ZHU, GRAVITY TRADING, INC. and TONY IN CHONG